

1 RENE L. VALLADARES  
Federal Public Defender  
2 Nevada State Bar No. 11479  
KEISHA K. MATTHEWS  
3 Assistant Federal Public Defender  
411 E. Bonneville, Ste. 250  
4 Las Vegas, Nevada 89101  
(702) 388-6577/Phone  
5 Keisha\_Matthews@fd.org

6 Attorney for Matthew Lopes

7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 MATTHEW LOPES,

14 Defendant.  
15  
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Case No. 2:24-cr-00074-JCM-BNW

**Stipulation to Set Joint Change of Plea  
and Sentencing Hearing**

17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,  
18 United States Attorney, and Daniel J. Cowhig, Assistant United States Attorney, counsel for  
19 the United States of America, and Rene L. Valladares, Federal Public Defender, and  
20 Keisha K. Matthews, Assistant Federal Public Defender, counsel for Matthew Lopes, that the  
21 currently scheduled change of plea on June 12, 2024 at 10:30am, be modified to a joint change  
22 of plea and sentencing hearing. If the Court's calendar permits, the parties request that the  
23 hearing remain set for June 12, 2024, at 10:30am.

24 This Stipulation is entered into for the following reasons:

25 1. Mr. Lopes intends to plead guilty without the benefit of a plea agreement. The  
26 parties believe that based on his criminal history category and adjusted offense level his

1 guideline range is 2-8 months. The parties request that this Court set the change of plea and  
2 sentencing on the same day. Setting the hearings on the same day, will alleviate the need for an  
3 additional hearing and expedite resolution of this case. This will also permit Mr. Lopes the  
4 opportunity to request a within guideline sentence without having to request an expedited  
5 sentencing hearing or wait the traditional 90 days from the date of the change of plea hearing.

6 2. Mr. Lopes previously consented to institute a presentence investigation and  
7 disclose the report before conviction or plea of guilty. ECF No. 17. He had his presentence  
8 report interview on April 25, 2024.

9 3. Probation has no objection to the hearings being combined and has indicated the  
10 presentence report will be completed by Friday, May 31, 2024.

11 4. Mr. Lopes agrees with the request to have a joint plea and sentencing hearing.

12 DATED this 30th day of May 2024.

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14 RENE L. VALLADARES  
Federal Public Defender

JASON M. FRIERSON  
United States Attorney

15  
16 */s/ Keisha K. Matthews*  
By \_\_\_\_\_

*/s/ Daniel J. Cowhig*  
By \_\_\_\_\_

17 KEISHA K. MATTHEWS  
18 Assistant Federal Public Defender

DANIEL J. COWHIG  
Assistant United States Attorney

1 **UNITED STATES DISTRICT COURT**

2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

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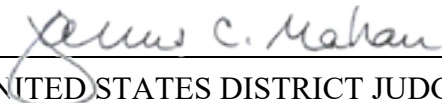
Case No. 2:24-cr-00074-JCM-BNW

**ORDER**

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10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS ORDERED that the Change of Plea hearing currently scheduled for Wednesday,  
12 June 12, 2024, at 10:30 a.m., be modified to be a joint Change of Plea and Sentencing hearing  
13 scheduled on **June 12, 2024, at 10:30 a.m.**

14 DATED June 3, 2024.

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17 UNITED STATES DISTRICT JUDGE